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1 A (Miller) In many cases they do. They are
2 able to do that. Of course, the relationship between
3 billing telephone number and working telephone number
4 can be one to many, and in--one of the reasons that
5 we hadn't provided at this point in time that ability
6 for a reseller to derive the same number was because
7 of a concern about privacy. We've addressed that and
8 we have a change in place that will provide that
9 capability in the near future. I believe it is we
10 have it in, subject to correction, I believe it is
11 two months.

12 Q Will that give the resale representative
13 exactly the same information as a NYNEX retail
14 representative and all the same capabilities to
15 access a bill telephone number from a working
16 telephone number?

17 A (Miller) I'm not aware of any differences
18 between those two.

19 Q NYNEX has the ability to modify
20 specifications for its EIF interface, does it not?

21 A (Miller) Yes. It does.

22 Q Has it not changed the EIF interface a
23 number of times in the last six or eight months?

24 A (Miller) When NYNEX defined the EIF

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1 interface it was being defined in the absence of any
2 national standard. We were being required to provide
3 interfaces in a very accelerated timeframe and we
4 thought we had to put in place interface definitions
5 that would suit the kind of business that we're going
6 to, first of all, through the reseller business and
7 ultimately through the unbundled element business and
8 therefore, indeed, the EIF specification has
9 undergone additions and changes as we have learned
10 more about the kind of business that are forthcoming
11 and as in fact we had to deal with things like the
12 FCC order on August 8th.

13 Q Haven't you in fact been informed that the
14 customer who is being the EIF interface has had his
15 service interrupted when changes were made to the EIF
16 interface and, in fact, some of those changes were
17 not disclosed at the time? They were not?

18 A (Miller) I personally am not aware of that.

19 Q Anyone on the panel know that? Mr. Kennedy
20 has spoken of it in his statement I wonder if he
21 could elucidate on that?

22 A (Kennedy) There were two instances, the
23 first being the first of January, the second being
24 the first of March where revisions were made to the

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1 EIF specifications. We were not advised in advance.
2 And on the first business day following those
3 updates, orders that we sent in to DCAS were rejected
4 because they didn't meet the system edits.

5 In both cases we were advised by the folks
6 at the systems administration group down at the
7 resale center that we would get a new copy of the
8 specifications and in both cases they were delivered
9 by messenger to us that day and we were able to bring
10 our system back up.

11 Unfortunately, we were told the second time
12 which was March 1st that we were on the distribution
13 list and we would get advised in advance if there are
14 any additional changes to be made.

15 April 1st there were additional changes
16 that were made. We were not notified and just
17 yesterday, again, orders were rejected by the system.

18 MR. REUBEN: I have--

19 JUDGE STEIN: Mr. Reuben, you're out of
20 time.

21 MR. REUBEN: Sorry.

22 JUDGE STEIN: Thank you. We had two other
23 hands for questions. No? Okay. It's 4
24 o'clock. Let's give the reporter a break.

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1 We'll reconvene in 15 minutes.

2 (Recess taken at 4:00 p.m. and reconvened
3 at 4:32 p.m.)

4 JUDGE STEIN: I think we would like to go
5 back on the record and to go just to go 6
6 o'clock tonight and then end for tonight. We're
7 optimistic that we can get through the bulk of
8 what we have in that time period. Maybe Andy
9 can lay out what he'd like to do and we should
10 probably take a minute after we break. We'll
11 have a little off-the-record conference on what
12 bits and pieces we have left over from yesterday
13 and whether we want to go to them tomorrow or
14 Friday but we don't--you don't need to be on the
15 record.

16 (Discussion had off the record.)

17 We're going to start with further comments
18 by the NYNEX panel?

19 A (Miller) Okay. Thank you, Your Honor.

20 Clearly there are many comments, observations and
21 questions and so on about the OSS interface
22 particularly and NYNEX needs time to respond
23 particularly to those items which are specifically
24 mentioned but we need to go back and do some

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1 research. We have successes for 3500 CSR processes;
2 we have processed 2,900 validation, 1100 conduit and
3 4600 product availability requests, so the systems
4 are in operation; some people are using them.

5 We have, in addition, trained 180
6 representatives from 48 CLECs who are operating or
7 plan to operate as resellers and, in addition, 6
8 CLECs who plan to operate in the unbundled element
9 network interconnect and we have another 3 companies
10 currently scheduled for training in that area in the
11 interface system we're offering.

12 One thing that I would like to address
13 specifically is the comments that are made about the
14 response times in terms of the web GUI system
15 particularly because there obviously is a great deal
16 of concern associated with that, and I'd like to
17 point out, again, that the strategy that NYNEX
18 adopted when we were entering this business was to
19 put in place a system that we felt would be easy for
20 people to get into the market and that was the
21 essence behind the design of the web GUI system.

22 Indeed, in much of the design we have put
23 in place capabilities, screen designs and so on that
24 are not available to our retail representatives, and,

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1 in fact, we believe our in advance in knowledge and
2 understanding of how this business is conducted.

3 Now the trade-off of that is very clearly
4 that kind of an interface is not the most speedy in
5 the business. There's no question about that. I
6 think most people here who have experience using
7 Internet will have experienced similar kind of leaks
8 to response times.

9 We nevertheless understand that even with
10 that the response times that are being provided right
11 now can be improved and, in fact we have put in place
12 mechanisms to improve these response times in such a
13 way that we will definitely improve significantly the
14 performance and the response time of that particular
15 system but, nevertheless, I need to reiterate that we
16 do not expect to be the main interface that is used
17 even for preorder transactions.

18 We fully expected in getting in this
19 business particularly the larger carriers will be, in
20 fact, implementing systems of their own because they
21 will have their own procedures and practices in place
22 in order, in terms of conducting a negotiation with
23 their customers. We feel sure that some of them will
24 be conducting direct mail campaigns, will get

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1 responses to their written mail campaigns and they
2 will be wanting to issue orders to NYNEX in a bulk
3 form which is not a interactive form, which is again
4 why we put in place bulk order capabilities.

5 So, for example, in the case of the EIF
6 interface, which will provide an ability for a CLEC
7 to have its own system to communicate with our
8 system, we understand the response time there is not
9 as we would like to it to be at present, particularly
10 Mr. Kennedy and his company using this and that's the
11 one singular experience we have in production.

12 We are examining that and we believe we
13 have, we're going to conduct some tests to improve
14 that but it should be pointed out as an example that
15 a single request going through EIF with one single
16 request could contain up to 99 CSR requests within
17 that single request and get 99 responses within
18 whatever response time we're able to provide. And
19 the same with other preorder transactions. And,
20 again, how those responses are interpreted by the
21 CLEC system is something which is determined by the
22 CLEC.

23 We, in terms of the standards, I'd like to
24 dress now the adoption of EDI and other national

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1 standards which were comments that were made.

2 As was pointed out today there is no
3 standard, national standard for preordering
4 transactions. Indeed a recommendation was made on
5 March 7th. That recommendation is that to be
6 ratified which we fully expect would be and NYNEX
7 fully expects to fully implement that standard when
8 it is ratified. Obviously, we're looking at it right
9 now.

10 So other strategy is to pursue these
11 standards, to implement them as necessary, because we
12 made the decision to put in place earlier interfaces
13 that would not be adopted to standard. We have, in
14 fact, pledged to those customers that we could
15 continue with those interfaces so they would not be
16 required if they chose not to re-implement systems to
17 conform to the new standards.

18 In addition to that, we have been, we
19 continue to negotiate in good faith with at least two
20 of the major carriers in terms of developing a
21 commitment to the implementation of EDI, even
22 overlapping the definition of standards, so we're
23 negotiating to provide that EDI capability and we are
24 also as part of the negotiations agreeing to commit

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1 to the standard when that comes in place. That is
2 particularly true of AT&T.

3 Now I'd like to address the flow through
4 issue that was brought up. When we designed these
5 systems, we believed that the yardstick that was most
6 of importance to a CLEC was the yardstick of the
7 provisions interval, can the customer get their
8 service in a timeframe that our customer can get
9 equivalent service.

10 In fact, that is the yardstick that we're
11 using in terms of flow through. We will put, we have
12 committed to put in place if we are not able to flow
13 through order transactions through the mechanized
14 systems, then we will put in place people who will
15 provide service intervals in the same--to the same
16 degree that our own reps provide, and as we go on--
17 this is a very complex system. I'm sure I don't need
18 to tell you. We have up to 40 systems in the OSS
19 world that have to interact with each other and
20 through which we have to flow through these things.
21 We have put these eight transactions order types in
22 place, which were put in this week in fact and we
23 intend to continue that.

24 Clearly, what we are trying to effect here

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1 is our own efficiency in handling that, so we don't
2 have to put a lot of people in place where systems
3 can, in fact, do the provisioning.

4 We need to understand by experience what
5 the mix and profile of the orders are that are coming
6 through the system. Clearly, we expect this to
7 change quite dramatically in this first few months,
8 first couple of years of being in the competitive
9 wholesale business because it depends not only on the
10 nature of the reseller but the kind of markets they
11 are going to attack and how they're going to attack
12 them, so we have to make decisions based on our best
13 estimates and in conversations with the CLECs with
14 the kinds of orders that will flow through--that
15 will flow through.

16 I was concerned about the MCI comments in
17 terms of the trial, experiences it had with the trial
18 they have been conducting with our systems. We had
19 conducted some tests ourselves, particularly with
20 reference to the LCI experiences. We examined 84
21 orders--this is in response to MCI comment earlier--
22 54 of which were completed, 54 of which were
23 completed in the committed timeframes, 20 of them
24 were in query status which meant we had to go back to

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1 MCI to request a clarification of the, or on
2 something that might have been not clear to us.

3 There were another eight of the 84
4 confirmed awaiting completion and there are two that
5 we're still, we haven't yet processed through the
6 system.

7 Service order completion dates, eight of
8 them were completed many zero days; 32 were completed
9 in one day; 7 were completed in 2 days; 5 were
10 completed in 3 days; and 2 were completed in more
11 than 3 days. I don't know how many more days than
12 three days.

13 In addition, we also recently conducted a
14 random sample of 53 reseller requests on March 19th.
15 Of those 53 requests, 46 were provisioned within 2
16 business days which representing 87 percent. 96
17 percent of the orders completed through this service
18 order processor within 3 days; 38 percent of the
19 reseller contained interconnect due dates. We had to
20 go back and clarify that.

21 In some cases the reseller might think that
22 was a completion which was in excess if the due date;
23 in fact, if the due date was incorrect, it would not
24 be that.

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1 We also conducted a test yesterday, April
2 1st--whatever April 1st was, I'm sorry.

3 JUDGE STEIN: Yesterday.

4 A (Miller) --on 40 randomly selected orders,
5 and of those we found that 39 out of 40 were
6 provisioned within the timeframe that they should
7 have been provisioned yesterday or today. That was
8 the very recent test.

9 But nevertheless, we continue to be
10 concerned about this. We need to understand when
11 these occurrences happen and certainly we want to
12 correct them because this earlier experience is
13 incredibly invaluable to us as we develop the system.

14 The problem that was mentioned in terms of
15 repairs not being able to enter into the system, this
16 is a problem we currently have with the system, and
17 it has existed for sometime as the witness mentioned.
18 This problem is due to be fixed before the end of
19 April, and it affects the fact that the identity of
20 the reseller is not appearing on the record when the
21 record is going through the system and that probably
22 will be fixed by the end of April.

23 I'd like, also, to address, again, I'm
24 trying to do this in general terms so that we can

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1 progress along here, but three of the witnesses have
2 brought up the issue of migration as specified or
3 convert as specified, and in fact we are negotiating
4 with all of those companies instead of trying to
5 bring about a resolution of this issue.

6 We had not implemented that function
7 initially. The issue was discussed during the
8 collaborative sessions that the Commission undertook
9 last year and at that time it was not a requirement
10 to implement that.

11 There are some significant business issues
12 associated with it, not the least of which is our own
13 retail reps do not have the ability to do this. They
14 would have to, in fact, conduct the same comparison
15 of the CSR as a retail function. We do not believe
16 it is really a wholesale function but that's not my
17 intention to conduct negotiation here, I apologize,
18 but the point is that we're trying to reach some
19 conclusion of this, of this particular issue in
20 negotiations with the carriers.

21 In terms of capacity, again, I'd like to
22 add that in terms of the capacity of the gateway
23 system which I think is a concern that a lot of
24 people have over this issue, we have at present in

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1 the DCAS systems which handles not only the web GUI
2 but also the EIF transactions and the EDI
3 transactions, so therefore that is a potential
4 capacity point that we need to address.

5 We basically have two servers in place
6 today handling all the traffic that is coming in
7 through the systems. Those two servers will go to
8 the 11 by the end of April and we currently have in
9 place if the businesses demand it they will be able
10 to go to 27 by the end of August. Again, that is an
11 indication of the order of magnitude of what we have
12 to put in place to handle the capacity issue.

13 BY JUDGE STEIN:

14 Q Can you slow down? I'm speeding you up and
15 slowing you down simultaneously which doesn't seem
16 particularly fair.

17 A There was a comment made about not being
18 able to have access to the help desk that we put in
19 place, that we have put in place to offer help to the
20 resellers representatives who are having trouble
21 using our system. In fact, we did have a problem I
22 believe. We had a I hunt group problem at one time
23 which we couldn't resolve. We have since then put a
24 voice mail capability which hunts. We have no

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1 respond to any voice mail within 15 minutes at
2 present. We have to put in mail mechanisms to
3 improve that capability.

4 Now, I had not planned to go into any of
5 the other specifics that were brought up in the
6 testimony that was provided. As I say, I'd like the
7 time to go back and, if we have to enter on the
8 record the responses to those specifically--

9 JUDGE STEIN: That's fine. You want to
10 move to the next area?

11 MR. KLEIN: Why don't we do that.

12 Q I'd like to ask the competitors who have
13 had any experience with the operations support
14 systems regarding the ordering of unbundled network
15 elements to give us some feedback similar to what the
16 competitors gave us in the resale arena and I guess
17 this time we'll go from this side of the table
18 starting with TCG if you have a comment and then
19 we'll proceed down the line.

20 JUDGE STEIN: Again, let me just admonish
21 you we have the affidavits. We will study them;
22 we have studied them and also I put the fans on
23 so it is kind of noisy. If you can use the
24 microphone, it will make it easier for everyone.

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1 A (DeJoy) I won't reiterate some of the
2 problems that already have been stated by the others
3 than saying that we've encountered similar issues
4 like downtime problems, logging on as well as
5 help-desk expertise.

6 Comments on unbundled loops, which from our
7 perspective is purely purchasing copper to provide
8 our dial tone to our customers. We've been working
9 with NYNEX for close to four months now trying to get
10 what's been referred to as the GUI interface
11 operational.

12 We have even delayed a beta trial to ensure
13 that our network infrastructure will work with
14 theirs, et cetera, in a hope to get this system
15 operational. We then decided to proceed by ordering
16 unbundled loops via faxed forms which have changed on
17 more than one occasion without us being notified,
18 which did cause a couple of order queries.

19 We did attend their training class but, as
20 I said, our biggest issue is still getting the system
21 operational. It's a daily battle that our ISP people
22 are having with theirs.

23 Some brief results of our trial: We tested
24 30 beta customers and the average interval which

1 seemed to be a topic of discussion here ranged
2 anywhere from 10 to 16 days to turn up an unbundled
3 loop.

4 I would like to comment on some other OSS
5 systems that we used for our core business with
6 NYNEX. We used what we call DCAS carrier, which is a
7 dial up standalone PC application which allows TCG to
8 do some query, to conduct some queries on NYNEX for
9 interface information prior to our issuing an order.

10 There are, I would say, one-half of the
11 applications within what I'm calling DCAS carriers,
12 are not functional, and they are service address,
13 validation, service order status, view confirmation
14 notice. What is working for us is the module within
15 DCAS carrier that allows us to search and verify our
16 CFAs prior to sending it over.

17 JUDGE STEIN: What is CFA?

18 THE WITNESS: (DeJoy) Circuit facility
19 assignment, nomenclature used in our cable
20 interface at our physical collocations.

21 A What I will say is not having things like
22 this service address validation module activated or
23 working within DCAS carrier has caused an enormous
24 amount of order queries as defined before which

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1 delays are provisioning cycle to our customers
2 dramatically.

3 Another issue with order queries is in a
4 lot of cases they require a lot of manual
5 intervention to resolve. Let's make a phone call to
6 their center and vice verse and--

7 JUDGE STEIN: Off the record for a second.

8 (Discussion had off the record.)

9 Back on the record.

10 We'll go back to Mr. DeJoy.

11 A (DeJoy) I was talking about order queries,
12 and it's my belief that due to the fact that some of
13 the options are not operational for us in DCAS
14 carrier, as I was saying, service address validation,
15 and service order status causes a lot of manual
16 intervention on both our part from TCG as well as
17 that of NYNEX to resolve queries which take a lot of
18 time as well as to obtain order status to see where
19 our orders are and see when service will be turned
20 up, et cetera.

21 As it relates to, just in closing, on
22 unbundled loops, I had a couple of comments on our
23 core business and I'll be brief. We are not using
24 DCAS module not because we don't want to but because

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1 we have not seen it work as of yet. We very much
2 would like to get that working so that we can
3 increase our order volumes and roll out our product
4 in the New York area.

5 As it relates to where the majority of our
6 order activity is with NYNEX, we are and have been
7 using a standalone PC application called BDS Telis,
8 which is a dial up standalone PC application which is
9 the only means that we as of right now feel semi
10 comfortable we've been using to issue our orders.

11 We have had requested that NYNEX and their
12 vendor come to our provisioning site in Denver to
13 ensure that we were set up properly and that things
14 were working. They recommended at the end of that
15 meeting that we use these on a standalone PC, don't
16 interface these PCs with our network to ensure that
17 there's nothing to corrupt the software that we're
18 using in issuing our orders.

19 So our service reps that we have that order
20 with NYNEX have two, in some cases three PCs on their
21 desk and those other PCs are used, one is used for
22 DCAS; another one is used or BDS Telis and the third
23 one for our provisioning system. We're in the same
24 boat as these other folks on the panel here in that

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1 we need to enter all our orders twice. The order
2 comes in from our customer, goes into our system and
3 then we manually enter it in the other system and
4 that would apply for DCAS as well that were
5 operational.

6 But, as I said, we only semi trust BDS
7 Telis, so we've had NYNEX agree to do was to review a
8 daily fax of all the orders that we send over daily
9 to ensure that they received them and they send us
10 another fax on the following day to tell us which
11 ones they did or did not receive. It's a very manual
12 process for us.

13 Back in September of last year, which was
14 when we agreed to start doing this process, we also
15 agreed that it's time to roll out what's called NDM
16 which is a network data mover which was mentioned
17 before by Mr. Miller.

18 We have been trying to get this to work
19 since October and it's been a very painful effort
20 from our MIS folks working with theirs in Blue Hill
21 to get this system functioning, and it is my belief
22 that, if NDM were operational, we would not have the
23 dual manual order entry that we and most of these
24 other folks are faced with today.

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1 That's all I wanted to say.

2 JUDGE STEIN: Thank you.

3 A (Haines) Very briefly, I just want to make
4 a couple of statements for the record in relation to
5 lack of support systems. TCG has requested DCAS for
6 trouble reporting for the last two years and we were
7 told, as recently as two weeks ago, that it is in a
8 test phase only at this point, not releasable to TCG.

9 TCG currently reports 40 to 50 troubles a
10 day to NYNEX manually and that process takes anywhere
11 from 5 minutes to 15 minutes per trouble, and then
12 just added on top of that getting status, scheduling
13 dispatches, it takes TCG three people to every one of
14 our--let me rephrase that, three people to manage
15 NYNEX troubles everyday where it takes one to manage
16 our entire network from New York on reporting
17 troubles, so it's a manual effort that is causing us
18 a lot of time, and with our customers we can't give
19 good status on where the troubles are, when they will
20 be fixed, and it just doesn't do any good for us in
21 the marketplace, and that's all I have.

22 JUDGE STEIN: Thank you.

23 A (Spivy) I'll speak briefly on behalf of MCI
24 regarding operational support systems, unbundled

1 network elements. Our experience to date has been
2 primarily in a trial status. Our experience has been
3 with faxing forms for customer level ordering. Only
4 until recently have we been offered the alternative
5 of using an operational support systems using the GUI
6 for unbundled network elements ordering and we have
7 been through that training in the last couple of
8 weeks.

9 We expect we're going to run into a lot of
10 the same issues with the GUI that we have found to
11 date, and I won't elaborate any further than say
12 those issues, many of those issues will be
13 transferable resell and bundle. I think we're going
14 to run into some similar problems.

15 At this point, we are eagerly awaiting
16 NYNEX moving forward and supporting unbundled network
17 ordering via EDI per the industry standards that are
18 in definition and there are no specs to date.

19 We have experienced in other markets where
20 other LECs have been able to move forward, other
21 incumbent LECs offering unbundled services have been
22 moving forward and specifying EDI specifications for
23 unbundled network elements and we look forward to
24 that happening here so we can begin ordering on a

1 larger volume basis that we plan to be able to order
2 on. That's really been our experience to date and
3 I'll close with that.

4 JUDGE STEIN: Thank you.

5 A (Halloran) I won't re-cover what's in my
6 testimony on pages 10 through 15 but I did want to
7 make a statement that I make in there to some of the
8 discussion on resale.

9 We have reached agreement as Mr. Miller
10 said with NYNEX to go forward in the preorder phase.
11 Most importantly in all of the processes we have an
12 agreement to go forward but in preorder in the phase
13 that you heard a lot of discussion about, how
14 unsatisfactory the current state is, we are going to
15 move to EDI, and I do say in my statement that we've
16 said that would take nine months to get there.

17 That nine months was a timeframe developed
18 jointly with the NYNEX team before we all gave our
19 best estimate of the time that it would take. What I
20 wanted to link it to the discussions here was that
21 our assumptions were that the business rules that
22 apply to resale would just roll over to the elements;
23 we wouldn't have to reinvent that and that there
24 would be change control in place, and already I've

1 heard that there is different information preorder
2 from unbundled network elements so I'm concerned
3 about that nine-month estimate we have in there.

4 And the second point and I'm doing,
5 Mr. Miller said NYNEX fully intends to implement
6 standards. We will know next week—I wish it was
7 this week—how well that will happen. The OBF has a
8 standard form for INP only and we'll talk about
9 number portability tomorrow and we have had many
10 sitdowns to compare spec to spec how NYNEX intends to
11 process that versus what the standard body supports.
12 Those were the only additional comments?

13 A (Hou) Just quickly to add to Ms. Halloran's
14 comment, I think everyone understands the importance
15 of electronic interfaces. I think everyone has heard
16 what my definition of electronic interface is, and I
17 think my understanding right now there are no
18 electronic interfaces defined for customer specific
19 among the network elements and I encourage that NYNEX
20 adhere at least to a process of that.

21 There is documentation of interface
22 specifications. There is baselining and change
23 control processes behind that and we understand that
24 changes occur for those interfaces well beforehand

1 and that is jointly mutually agreed to by the parties
2 before those changes occur.

3 A (Kennedy) No comments.

4 BY JUDGE STEIN:

5 Q Let me ask you a question to clarify for
6 the record. Using your definition of electronic
7 interface, is there presently an electronic interface
8 in place for resale ordering?

9 A (Hou) From an EIF perspective there is an
10 electronic interface from generics definition.

11 Q Thank you.

12 A (Wehnes) Worldcom has minimal experience
13 with the individual web or DCAS. Other people have
14 been trained on it. But we are a little different
15 than some of the other folks that have talked to you
16 this morning.

17 We are the predominant CLEC that orders
18 unbundled loops. We process today approximately 400
19 orders a month via fax, which is approximately 1600
20 pages a month for unbundled loops. We report
21 approximately 286 troubles a month through the NYNEX
22 service retail bureau for unbundled links and as such
23 we are not in a beta mode. We're dealing with
24 customers.